

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

REGINALD BYRON CLEMONS,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:22-cv-00158-SRW
)	
MICHELLE BASHAM, et al.,)	
)	
Defendants.)	

JOINT MOTION FOR PROTECTIVE ORDER

All parties hereby move this Court to enter a Protective Order protecting the confidentiality of certain documents produced in this litigation. In support of this Motion, the parties state as follows:

1. The Parties have conferred and addressed concerns regarding certain confidential documentation to be produced in this case.
2. Some sensitive and confidential records and other documentation are anticipated to be produced, including but not limited to closed records of the Department of Corrections and medical records of Plaintiff.
3. To address these concerns, the Parties have established a Protective Order to govern the disclosure of confidential information.

WHEREFORE, the parties respectfully request that this Court issue the attached Protective Order, and for such other relief as this Court deems just

and proper.

Respectfully submitted,

ANDREW BAILEY

Attorney General

/s/Melody A. McCombs

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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of March, 2024, I electronically filed the foregoing with the Clerk of Court via Case.net, which sent notification to counsel of record.

/s/Melody A. McCombs

Melody A. McCombs

Assistant Attorney General